

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

_____)	
BMADDOX ENTERPRISES LLC,)	
)	
Plaintiff,)	Case No. 17-cv-1889-RA-SLC
)	
v.)	
)	
MILAD OSKOUIE, OSKO M LTD, and)	
PLATINUM AVENUE HOLDINGS PTY, LTD,)	
)	
Defendants.)	
_____)	
MILAD OSKOUIE and PLATINUM AVENUE)	
HOLDINGS PTY, LTD,)	
)	
Counterclaim Plaintiffs,)	
)	
v.)	
)	
BMADDOX ENTERPRISES LLC and)	
BRANDON MADDOX,)	
)	
Counterclaim Defendants.)	
_____)	

DECLARATION OF BRANDON MADDOX CONCERNING DAMAGES

I, Brandon Maddox, state as follows:

1. I am the controlling owner of BMaddox Enterprises LLC (“BMaddox”).
2. I personally managed the creation and maintenance of the website located at <ffl123>.com, which includes paying all invoices related to the same.
3. The monthly cost to BMaddox paid to Rackspace to utilize a managed/dedicated server for <ffl123.com> with security and monthly maintenance is and has been \$1,999 for all of 2015 to the present.
4. The monthly cost to BMaddox paid to WordPress & PHP developers for maintenance, security, and updates is and has been \$1,495 for all of 2015 to the present.
5. The monthly cost to BMaddox paid to WooCommerce for cart maintenance is and has been \$120 for all of 2015 to the present.
6. The monthly cost to BMaddox paid to PCI Compliance is and has been \$65 for all of 2015 to the present.
7. The monthly cost to BMaddox paid to Cloudflare and Sucurri.net for firewalls on the <ffl123.com> website is and has been \$89 for all of 2015 to the present.

I declare under penalty of perjury that the foregoing is true and correct pursuant to 28 U.S.C. § 1746.

Dated: November 19, 2021

Respectfully submitted,

By: Brandon L. Maddox
Brandon Maddox